

State: Pennsylvania **Filing Company:** The Prudential Insurance Company of America
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Individual Long Term Care Insurance
Project Name/Number: ILTC-3 Re-Rate/5I-2015

Filing at a Glance

Company: The Prudential Insurance Company of America
Product Name: Individual Long Term Care Insurance
State: Pennsylvania
TOI: LTC03I Individual Long Term Care
Sub-TOI: LTC03I.001 Qualified
Filing Type: Rate - G.I. (Guaranteed Issue)
Date Submitted: 01/12/2016
SERFF Tr Num: PRUD-130398021
SERFF Status: Assigned
State Tr Num: PRUD-130398021
State Status: Received Review in Progress
Co Tr Num: IIGHILTC3RERATE-RP-PA

Implementation: On Approval
Date Requested:
Author(s): Laura Hughes, Raenonna Ransom
Reviewer(s): Jim Laverty (primary)
Disposition Date:
Disposition Status:
Implementation Date:

State Filing Description:

Proposed 16.3% rate increase (0% if no inflation and 20.8% on policies with automatic inflation) on 1,530 PA policyholders of Prudential forms GRP 113172, GRP 113570, GRP 113172 ED 05/2009, GRP 113570 ED 05/2009 (known as Series ILTC-3).

State: Pennsylvania **Filing Company:** The Prudential Insurance Company of America
TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified
Product Name: Individual Long Term Care Insurance
Project Name/Number: ILTC-3 Re-Rate/5I-2015

General Information

Project Name: ILTC-3 Re-Rate Status of Filing in Domicile: Pending
Project Number: 5I-2015 Date Approved in Domicile:
Requested Filing Mode: Review & Approval Domicile Status Comments: Filed Concurrently.
Explanation for Combination/Other: Market Type: Individual
Submission Type: New Submission Individual Market Type:
Overall Rate Impact: 16.3% Filing Status Changed: 01/13/2016
State Status Changed: 01/20/2016
Deemer Date: Created By: Raenonna Ransom
Submitted By: Raenonna Ransom Corresponding Filing Tracking Number:

Filing Description:

Please refer to the Filing Cover Letter attached to the Supporting Documentation Tab of this filing.

Company and Contact

Filing Contact Information

Keith Burns, Director and Actuary Kieth.Burns@Prudential.com
ROS3 402-934-4280 [Phone]
Roseland, NJ 11111

Filing Company Information

The Prudential Insurance CoCode: 68241 State of Domicile: New Jersey
Company of America Group Code: 304 Company Type: Life
751 Broad Street Group Name: State ID Number:
Newark, NJ 07102-3777 FEIN Number: 22-1211670
(973) 802-6000 ext. [Phone]

Filing Fees

Fee Required? No
Retaliatory? No
Fee Explanation:

SERFF Tracking #:

PRUD-130398021

State Tracking #:

PRUD-130398021

Company Tracking #:

IIGHILTC3RERATE-RP-PA

State:

Pennsylvania

Filing Company:

The Prudential Insurance Company of America

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

Individual Long Term Care Insurance

Project Name/Number:

ILTC-3 Re-Rate/5I-2015

Rate Information

Rate data applies to filing.

Filing Method:

SERFF

Rate Change Type:

Increase

Overall Percentage of Last Rate Revision:

17.800%

Effective Date of Last Rate Revision:

02/01/2014

Filing Method of Last Filing:

SERFF

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	Number of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where req'd):	Minimum % Change (where req'd):
The Prudential Insurance Company of America	16.300%	16.300%	\$590,994	1,530	\$3,625,732	20.800%	0.000%

SERFF Tracking #:

PRUD-130398021

State Tracking #:

PRUD-130398021

Company Tracking #:

IIGHILTC3RERATE-RP-PA

State:

Pennsylvania

Filing Company:

The Prudential Insurance Company of America

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

Individual Long Term Care Insurance

Project Name/Number:

ILTC-3 Re-Rate/5I-2015

Rate/Rule Schedule

Item No.	Schedule Item Status	Document Name	Affected Form Numbers (Separated with commas)	Rate Action	Rate Action Information	Attachments
1		Appendix F - Rate Pages	GRP 113172, GRP 113570, GRP 113172 ED 05/2009, GRP 113179 ED 05/2009	Revised	Previous State Filing Number: PRUD-129026099 Percent Rate Change Request: 17.8	PA - Appendix F - Rate Pages (ILTC-3) - 1-2016.pdf,

Appendix F
The Prudential Insurance Company of America
Individual Long Term Care Insurance Plan
Base Rates and Adjustment Factors

GRP 113172, GRP113172 ED 05/2009, GRP113570 and GRP 113570 ED 05/2009 - For Applications Received Prior to 4/5/2011

Page 1 of 5

PENNSYLVANIA BASE RATES BEFORE ADJUSTMENTS								
Gross Annual Premium Per \$10.00 of Facility Care Daily Benefit								
Home Care Daily Benefit: 100% of Facility Care Daily Benefit								
\$1,825 x Daily Benefit Lifetime Maximum Benefit (5 Year Benefit Period)								
90 Day Elimination Period								
Lifetime Premium Payment Option								
Inflation Option								
Issue Age	None	Guaranteed Purchase Option	5% Automatic Simple	5% Automatic Compound (2x Maximum)		3% Automatic Compound (No Maximum)	4% Automatic Compound (No Maximum)	5% Automatic Compound (No Maximum)
18-30	54.97	59.09	113.07	74.24		109.32	144.28	169.04
31	55.55	59.72	114.23	76.76		112.33	147.96	172.96
32	56.13	60.35	115.39	79.35		115.40	151.72	176.92
33	56.73	60.98	116.56	82.05		118.57	155.59	180.96
34	57.32	61.63	117.73	84.81		121.81	159.55	185.04
35	57.93	62.28	118.94	87.69		125.15	163.61	189.20
36	58.53	62.94	120.15	90.66		128.57	167.79	193.40
37	59.15	63.60	121.38	93.73		132.08	172.06	197.67
38	59.77	64.27	122.61	96.91		135.71	176.44	201.99
39	60.40	64.96	123.86	100.18		139.43	180.93	206.40
40	61.04	65.64	125.11	103.57		143.23	185.55	210.84
41	61.94	66.62	127.37	106.47		146.89	189.46	215.34
42	62.87	67.61	129.68	109.44		150.61	193.45	219.93
43	63.81	68.62	132.03	112.49		154.45	197.52	224.60
44	64.76	69.64	134.43	115.63		158.38	201.70	229.35
45	65.73	70.68	136.85	118.87		162.40	205.94	234.18
46	66.70	71.73	139.33	122.19		166.53	210.28	239.11
47	67.69	72.80	141.86	125.60		170.76	214.71	244.14
48	68.71	73.89	144.43	129.10		175.11	219.24	249.23
49	69.73	74.99	147.04	132.71		179.56	223.87	254.45
50	70.77	76.10	149.70	136.42		184.12	228.59	259.76
51	74.14	79.72	157.09	143.88		188.30	233.37	265.95
52	77.66	83.50	164.87	151.76		192.57	238.24	272.30
53	81.35	87.47	173.00	160.05		196.93	243.23	278.76
54	85.22	91.62	181.55	168.81		201.37	248.32	285.33
55	89.27	95.98	190.53	178.04		205.94	253.52	292.01
56	93.50	100.54	199.92	187.78		210.60	258.83	298.82
57	97.94	105.31	209.81	198.06		215.36	264.24	305.77
58	102.60	110.32	220.17	208.89		220.24	269.77	312.81
59	107.47	115.56	231.05	220.32		225.22	275.41	319.99
60	112.57	121.04	242.46	232.37		230.33	281.17	327.30
61	121.54	130.68	258.71	251.12		244.74	294.90	340.31
62	131.21	141.08	276.06	271.38		260.05	309.28	353.75
63	141.65	152.31	294.57	293.28		276.29	324.37	367.57
64	152.92	164.42	314.33	316.96		293.57	340.21	381.81
65	165.09	177.51	335.41	342.54		311.94	356.81	396.45
66	182.96	196.74	367.99	375.58		341.51	388.90	430.22
67	202.77	218.04	403.74	411.82		373.86	423.88	466.84
68	224.74	241.66	442.97	451.55		409.31	462.00	506.61
69	249.07	267.83	486.00	495.11		448.10	503.57	549.75
70	276.06	296.84	533.22	542.88		490.57	548.84	596.57
71	309.54	332.84	592.44	604.68		546.22	606.79	656.72
72	347.08	373.21	658.20	673.50		608.18	670.85	722.93
73	389.18	418.47	731.30	750.16		677.17	741.68	795.83
74	436.38	469.24	812.49	835.55		753.99	819.97	876.07
75	489.31	526.15	902.69	930.66		839.51	906.53	964.41
76	543.60	584.53	997.05	1,025.88		927.26	996.76	1,055.54
77	603.92	649.39	1,101.27	1,130.86		1,024.19	1,095.96	1,155.28
78	670.93	721.44	1,216.38	1,246.57		1,131.24	1,205.04	1,264.47
79	745.37	801.49	1,343.54	1,374.14		1,249.48	1,324.96	1,383.96

Pennsylvania Rates
April 1, 2016

Appendix F
The Prudential Insurance Company of America
Individual Long Term Care Insurance Plan
Base Rates and Adjustment Factors

GRP 113172, GRP113172 ED 05/2009, GRP113570 and GRP 113570 ED 05/2009 - For Applications Received Prior to 4/5/2011

Page 2 of 5

PENNSYLVANIA BASE RATES BEFORE ADJUSTMENTS								
Gross Annual Premium Per \$10.00 of Facility Care Daily Benefit								
Home Care Daily Benefit: 100% of Facility Care Daily Benefit								
\$1,825 x Daily Benefit Lifetime Maximum Benefit (5 Year Benefit Period)								
90 Day Elimination Period								
Premium Decrease at 65								
Inflation Option								
Issue Age	None		5% Automatic Simple	5% Automatic Compound (2x Maximum)		3% Automatic Compound (No Maximum)	4% Automatic Compound (No Maximum)	5% Automatic Compound (No Maximum)
18-30	63.22		135.68	100.23		157.86	194.68	228.22
31	64.15		137.63	104.00		161.04	199.96	234.57
32	65.11		139.60	107.91		164.25	205.36	241.07
33	66.07		141.58	111.97		167.56	210.93	247.69
34	67.06		143.61	116.19		170.92	216.64	254.45
35	68.05		145.67	120.55		174.34	222.50	261.31
36	69.06		147.74	125.09		177.85	228.53	268.32
37	70.08		149.86	129.80		181.42	234.71	275.48
38	71.12		152.00	134.68		185.05	241.07	282.76
39	72.17		154.18	139.74		188.76	247.60	290.20
40	73.25		156.39	145.01		192.57	254.31	297.76
41	74.65		160.45	149.57		195.45	257.50	301.49
42	76.07		164.61	154.30		198.39	260.71	305.24
43	77.52		168.89	159.15		201.37	263.97	309.04
44	78.99		173.28	164.18		204.41	267.26	312.88
45	80.50		177.78	169.36		207.49	270.62	316.76
46	82.03		182.38	174.69		210.60	273.99	320.68
47	83.60		187.13	180.20		213.77	277.43	324.65
48	85.18		192.00	185.89		216.98	280.88	328.67
49	86.81		196.99	191.76		220.25	284.41	332.71
50	88.46		202.10	197.80		223.55	287.96	336.80
51	95.28		217.66	214.34		237.60	303.99	354.85
52	102.62		234.41	232.25		252.52	320.92	373.83
53	110.52		252.46	251.67		268.38	338.77	393.78
54	119.03		271.90	272.72		285.23	357.63	414.79
55	128.19		292.83	295.51		303.16	377.55	436.85
56	138.06		315.37	320.22		322.19	398.57	460.04
57	148.70		339.65	346.99		342.42	420.75	484.43
58	160.15		365.81	376.01		363.92	444.17	510.07
59	172.48		393.98	407.43		386.78	468.89	537.00
60	185.77		424.30	441.50		411.08	494.99	565.32

Pennsylvania Rates
April 1, 2016

Appendix F
The Prudential Insurance Company of America
Individual Long Term Care Insurance Plan
Base Rates and Adjustment Factors

GRP 113172, GRP113172 ED 05/2009, GRP113570 and GRP 113570 ED 05/2009 - For Applications Received Prior to 4/5/2011

Page 3 of 5

ADJUSTMENT FACTORS – LIFETIME MAXIMUM (BENEFIT PERIOD)	
Benefit Period	
2 Year	0.73
3 Year	0.86
4 Year	0.94
5 Year	1.00
6 Year	1.04
10 Year	1.34
Unlimited	1.47

ADJUSTMENT FACTORS – ELIMINATION PERIOD	
Elimination Period	
30 Day	1.25
60 Day	1.08
90 Day	1.00
120 Day	0.97

ADJUSTMENT FACTORS – HOME CARE DAILY BENEFIT	
Home Care Benefit as a % of Facility Benefit	
50%	0.93
75%	0.97
100%	1.00
150%	1.12

ADJUSTMENT FACTORS – MONTHLY BENEFIT RIDER					
Home Care Benefit as a % of Facility Benefit	INFLATION OPTION				
	None	GPO	Simple, 3 & 4% Compound (No Maximum)	5% Compound (2x Maximum)	5 % Compound (No Maximum)
50%	1.065	1.065	1.075	1.090	1.090
75%	1.063	1.063	1.068	1.083	1.083
100%	1.050	1.050	1.055	1.070	1.070
150%	1.047	1.047	1.052	1.067	1.067

ADJUSTMENT FACTORS – CASH BENEFIT RIDER						
Home Care Benefit as a % of Facility Benefit	Benefit Period	INFLATION OPTION				
		None	GPO	Simple, 3 & 4% Compound (No Maximum)	5% Compound (2x Maximum)	5 % Compound (No Maximum)
50%	2	1.43	1.43	1.48	1.50	1.52
	3	1.46	1.46	1.50	1.53	1.55
	4	1.48	1.48	1.52	1.55	1.57
	5	1.50	1.50	1.54	1.57	1.58
	6	1.52	1.52	1.57	1.59	1.61
	10	1.56	1.56	1.60	1.63	1.65
75%	2	1.52	1.52	1.57	1.60	1.62
	3	1.55	1.55	1.60	1.63	1.65
	4	1.57	1.57	1.62	1.65	1.66
	5	1.59	1.59	1.64	1.66	1.68
	6	1.62	1.62	1.66	1.69	1.71
	10	1.65	1.65	1.70	1.73	1.75
100%	2	1.63	1.63	1.68	1.71	1.73
	3	1.66	1.66	1.71	1.74	1.76
	4	1.68	1.68	1.73	1.76	1.78
	5	1.70	1.70	1.75	1.78	1.80
	6	1.73	1.73	1.78	1.81	1.83
	10	1.77	1.77	1.82	1.85	1.87

Appendix F
The Prudential Insurance Company of America
Individual Long Term Care Insurance Plan
Base Rates and Adjustment Factors

GRP 113172, GRP113172 ED 05/2009, GRP113570 and GRP 113570 ED 05/2009 - For Applications Received Prior to 4/5/2011

Page 4 of 5

ADJUSTMENT FACTORS – FLEXIBLE CASH BENEFIT RIDER						
Home Care Benefit as a % of Facility Benefit	Benefit Period	INFLATION OPTION				
		None	GPO	Simple, 3 & 4% Compound (No Maximum)	5% Compound (2x Maximum)	5 % Compound (No Maximum)
50%	2	1.215	1.215	1.240	1.250	1.260
	3	1.230	1.230	1.250	1.265	1.275
	4	1.240	1.240	1.260	1.275	1.285
	5	1.250	1.250	1.270	1.285	1.290
	6	1.260	1.260	1.285	1.295	1.305
	10	1.280	1.280	1.300	1.315	1.325
75%	2	1.260	1.260	1.285	1.300	1.310
	3	1.275	1.275	1.300	1.315	1.325
	4	1.285	1.285	1.310	1.325	1.330
	5	1.295	1.295	1.320	1.330	1.340
	6	1.310	1.310	1.330	1.345	1.355
	10	1.325	1.325	1.350	1.365	1.375
100%	2	1.315	1.315	1.340	1.355	1.365
	3	1.330	1.330	1.355	1.370	1.380
	4	1.340	1.340	1.365	1.380	1.390
	5	1.350	1.350	1.375	1.390	1.400
	6	1.365	1.365	1.390	1.405	1.415
	10	1.385	1.385	1.410	1.425	1.435

ADJUSTMENT FACTORS	
SHORTENED BENEFIT PERIOD NONFORFEITURE RIDER	
Included	
Yes	1.11
No	1.00

ADJUSTMENT FACTORS – UNDERWRITING CLASS	
Underwriting Class	
Preferred	0.85
Standard I	1.00
Standard II	1.25
Standard III	1.50

ADJUSTMENT FACTORS – JOINT WAIVER OF PREMIUM RIDER	
Issue Age	
18-54	1.01
55-64	1.02
65-69	1.03
70-74	1.05
75-79	1.09

ADJUSTMENT FACTORS – SHARED CARE	
Benefit Period	
2 Year	1.23
3 Year	1.15
4 Year	1.10
5 Year	1.08
6 Year	1.08
10 Year	1.07

ADJUSTMENT FACTORS – PREMIUM PAYMENT MODE	
Premium Payment Mode	
Annual	1.000
Semi-Annual	0.515
Quarterly	0.265
Monthly	0.090
Auto-Monthly	0.085

Appendix F
The Prudential Insurance Company of America
Individual Long Term Care Insurance Plan
Base Rates and Adjustment Factors

GRP 113172, GRP113172 ED 05/2009, GRP113570 and GRP 113570 ED 05/2009 - For Applications Received Prior to 4/5/2011
Page 5 of 5

ADJUSTMENT FACTORS - DISCOUNTS							
Partner Status	Partner Discount in Combination with						
		Employer Sponsored Program Discount I	Employer Sponsored Program Discount II	Affiliation Program Discount I	Affiliation Program Discount II	Affiliation Program Discount III	Affiliation Program Discount IV
Single Partner	0.85	0.80	0.75	0.80	0.77	0.75	0.73
Joint Partner	0.70	0.65	0.60	0.65	0.62	0.60	0.58
Single (No Partner)	1.00	0.95	0.90	0.95	0.92	0.90	0.88

ADJUSTMENT FACTORS SURVIVOR WAIVER OF PREMIUM RIDER		
Issue Ages	INFLATION OPTION	
	Automatic Inflation	No Inflation
18-34	1.121	1.08
35-44	1.136	1.11
45-54	1.146	1.13
55-64	1.141	1.13
65-74	1.107	1.10
75-79	1.075	1.07

ADJUSTMENT FACTORS - WAIVER OF THE ELIMINATION PERIOD FOR HOME CARE	
Elimination Period	
30 Day	1.04
60 Day	1.10
90 Day	1.12
120 Day	NA

ADJUSTMENT FACTORS - ELIMINATION OF CASH ALTERNATIVE OPTION	
Taken	
Taken	0.87
Not Taken	1.00

Elimination of Cash Alternative not available to policies with Cash or Flex Cash Riders

Pennsylvania Rates
April 1, 2016

SERFF Tracking #:

PRUD-130398021

State Tracking #:

PRUD-130398021

Company Tracking #:

IIGHILTC3RERATE-RP-PA

State:

Pennsylvania

Filing Company:

The Prudential Insurance Company of America

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

Individual Long Term Care Insurance

Project Name/Number:

ILTC-3 Re-Rate/5I-2015

Supporting Document Schedules

Satisfied - Item:	Transmittal Letter (A&H)
Comments:	
Attachment(s):	PA - Filing Cover Letter - 1-12-2016.pdf
Item Status:	
Status Date:	

Bypassed - Item:	Actuarial Certification (A&H)
Bypass Reason:	Please refer to Section 24, page 9, of the Actuarial Memorandum attached to the Supporting Documentation Tab of this filing.
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Actuarial Memorandum and Explanatory Information (A&H)
Comments:	
Attachment(s):	PA - Actuarial Memorandum - Revised Rates ILTC-3 - 1-2016.pdf PA - Appendices - ILTC-3 - 1-2016.pdf
Item Status:	
Status Date:	

Bypassed - Item:	Advertisements (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Authorization to File (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Insert Page Explanation (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	

SERFF Tracking #:

PRUD-130398021

State Tracking #:

PRUD-130398021

Company Tracking #:

IIGHILTC3RERATE-RP-PA

State: Pennsylvania

Filing Company:

The Prudential Insurance Company of America

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: Individual Long Term Care Insurance

Project Name/Number: ILTC-3 Re-Rate/5I-2015

Status Date:	
Bypassed - Item:	Rate Table (A&H)
Bypass Reason:	Please refer to the Rate Schedule Tab of this filing.
Attachment(s):	
Item Status:	
Status Date:	
Bypassed - Item:	Replacement Form with Highlighted Changes (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	
Bypassed - Item:	Reserve Calculation (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	
Bypassed - Item:	Variability Explanation (A&H)
Bypass Reason:	N/A
Attachment(s):	
Item Status:	
Status Date:	
Satisfied - Item:	Appendix C - Exhibit 1 - Mortality Details - ILTC-3
Comments:	
Attachment(s):	PA - Appendix C - Exhibit 1 - Mortality Details - ILTC-3 - 1-2016.pdf
Item Status:	
Status Date:	
Satisfied - Item:	Appendix C - Exhibit 2 - Lapse Analysis Details- ILTC-3
Comments:	
Attachment(s):	PA - Appendix C - Exhibit 2 - Lapse Analysis Details - ILTC-3 - 1-2016.pdf
Item Status:	
Status Date:	

SERFF Tracking #:

PRUD-130398021

State Tracking #:

PRUD-130398021

Company Tracking #:

IIGHILTC3RERATE-RP-PA

State:

Pennsylvania

Filing Company:

The Prudential Insurance Company of America

TOI/Sub-TOI:

LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name:

Individual Long Term Care Insurance

Project Name/Number:

ILTC-3 Re-Rate/5I-2015

Satisfied - Item:	Appendix C - Exhibit 3 - Morbidity Details - ILTC-3
Comments:	
Attachment(s):	PA - Appendix C - Exhibit 3 - Morbidity Details - ILTC-3 - 1-2016.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Appendix C - Description of Experience Analysis and Assumption Setting
Comments:	
Attachment(s):	PA - Appendix C - Description of Experience Analysis and Assumption Setting - 1-2016.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Appendix D - Persistency - ILTC-3
Comments:	
Attachment(s):	PA - Appendix D - Persistency - ILTC-3 - 1-2016.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Appendix E - DOB - ILTC-3
Comments:	
Attachment(s):	PA - Appendix E - DOB - ILTC-3 - 1-2016.pdf
Item Status:	
Status Date:	



Keith Burns, ASA, MAAA
Vice President and Actuary
Financial Management

The Prudential Insurance Company of America
Long Term Care Unit
100 Mulberry Street
Gateway Center 2, 11th Floor
Newark, NJ 07102
Tel 402 715-4861
keith.burns@prudential.com

January 12, 2016

The Honorable Teresa D. Miller
Commissioner of Insurance
Pennsylvania Insurance Department
1326 Strawberry Square
Harrisburg, PA 17120

Re.: The Prudential Insurance Company of America
NAIC #304-68241
Individual Long Term Care Insurance
Form Numbers: GRP 113172, et al, GRP 113172 ED 05/2009 et al, GRP 113570, et al and
GRP 113570 ED 05/2009, et al (Policies sold prior to 4/5/2011)

Dear Commissioner Miller:

We enclose for your review a long-term care insurance rate schedule change. We are requesting the approval of a premium rate increase for the above referenced forms. This rate revision is a follow-up request meant to recover rate revisions that were not fully approved in Pennsylvania. Approval of this request would bring Pennsylvania's premiums in line with states that have approved full amounts in the past.

Form GRP 113172 was previously approved by the Department on June 16, 2005 – Dept ID #A84013001. Form GRP 113172 ED 05/2009 was approved by the Department on September 22, 2009 – SERFF # PRUD-12565471. Form GRP 113570 was previously approved by the Department on February 9, 2006 Dept ID #A916998001. Form number GRP 113570 ED 05/2009 was previously approved by the Department on September 25, 2009 – SERFF #PRUD-125656020. The policy series of forms GRP 113172, GRP 113172 ED 05/2009, GRP 113570 and GRP 113570 ED 05/2009 were sold nationwide during the period of 2005 through 2012. These products are no longer being marketed in any state. Please be advised that this rate increase does not apply to policies whose applications were received on or after April 5, 2011.

Some of Prudential's pricing assumptions for this series of forms, although based on the best information then available, were not consistent with our emerging experience. In view of these results, we are requesting a rate increase for policy series GRP 113172, GRP 113172 ED 05/2009, GRP 113570 and GRP 113570 ED 05/2009, et al in the state of Pennsylvania. Premiums for policies with an automatic inflation rider of (3% compound, 4% compound, 5% compound, 5% compound to 2X, or 5% simple) would increase by 20.8%, while premiums for policies without automatic inflation would increase by 0.0%.

In addition, the historical and projected loss ratios of the business with the rate increase is needed to help ensure that future premiums, in combination with existing reserves, will be adequate to fund anticipated claims. We have tried to keep these increases as low as reasonably possible in the hope of minimizing the impact on our policyholders. We will continue to monitor the performance of this block of business after this rate action. It is possible that as we continue to regularly review the experience of these policies, another increase may be needed in the future.

The deterioration of experience relative to pricing has contributed to the need to strengthen Prudential's reserves depleting surplus. On a statutory basis, the LTC business holds \$1.6 billion in Asset Adequacy Testing reserves as of December 31, 2014. In addition, in 2012, Prudential's LTC business went into GAAP loss recognition incurring a pre-tax charge of \$639 million.

The requested rate increases will not restore original profit margins, but will help Prudential avoid additional losses as well as further depletion of its surplus. The increases will also help maintain equity within Prudential's policyholder population as deferring rate increases will only increase the size of needed future rate increases.

The proposed premium rates will be effective on each policy's first modal premium due date that is on or after the state increase effective date established by Prudential following state approval. The earliest increase, once approval is provided, will be no earlier than 60 days from the date of approval, so that Prudential can provide sixty days advance notice of the rate increase to insureds.

We understand that a premium increase may be difficult for our policyholders to absorb. Consequently, Prudential is prepared to offer a number of options to enable the premium an insured is paying to remain the same such as reducing their inflation coverage, reducing their benefit period, decreasing their Daily Benefit Maximum, or dropping rider(s) (e.g. optional coverage). Additionally, as an alternative, our policyholders may also exercise their rights under a non-forfeiture benefit rider or the policy's contingent non-forfeiture provision.

Furthermore, if not already exercised during the first rate increase, policyholders will also be given the opportunity to remove the Cash Alternative Benefit provision from their policy in return for a 13% premium reduction. These policy amendments (GRP 114978) and (GRP 114979) were previously approved by the Department on September 26, 2013, under SERFF Filing Numbers PRUD-129026928 and PRUD-129026885.

The following items are included with this submission:

- All Actuarial Material
- All Required Certifications
- State transmittal and checklists (If applicable)

Correspondence: Please correspond directly with my associate concerning this filing.

Raenonna Prince, CLTC, LTCP
Lead Analyst
The Prudential Insurance Company of America
P. O. Box 7907
Philadelphia, PA 19101-7907
Voice: (800) 732-0416 or (215) 658-6281
Fax: (888) 294-6335
e-mail: raenonna.prince@prudential.com

Very truly yours,



Keith Burns, ASA, MAAA
Vice President and Actuary

Enclosures

January 6, 2016
Actuarial Memorandum Supporting Rate Revision for
The Prudential Insurance Company of America
Individual Long-Term Care Insurance Plan
Pennsylvania

1. **Scope and Purpose**

The purpose of this memorandum is to provide actuarial information supporting a rate revision to premiums for the following The Prudential Insurance Company of America's Tax-Qualified individual long-term care Forms and their associated riders:

<u>Product Name</u>	<u>Form Number</u>	<u>Issue Dates in Pennsylvania</u>
ILTC3	GRP113172	9/2005 – 8/2012
ILTC3 Franchise	GRP113570	9/2005 – 8/2012
ILTC3	GRP113172 ED 05/2009	9/2005 – 8/2012
ILTC3 Franchise	GRP113570 ED 05/2009	9/2005 – 8/2012

This state also approved revised new business rates for the above form number that were effective for applications received on or after 4/5/2011. This rate revision will not apply to any policies applied for with this form number in this state after this date.

Some riders may not be available in all states. This rate filing is not intended to be used for other purposes.

The rate revision is a follow-up request meant to recover rate revisions that were not fully approved in Pennsylvania. The rate increases continue to be actuarially justified and are unchanged from our original requests.

Upon approval of this rate revision, Prudential will communicate to policyholders their options to reduce the impact of the rate increase. There will also be opportunities for almost all policyholders to keep the premium at or below the same level they were paying prior to the rate revision. These options will include increasing the elimination period, reducing the lifetime maximum, reducing the daily benefit, eliminating optional riders, electing the removal of the Cash Alternative Benefit Rider,, and a contingent non-forfeiture option that we will be offering to all policyholders regardless of their age or rate increase amount.

These revisions are necessary because the current best estimate projections of the nationwide lifetime loss ratios are significantly worse than the expected loss ratios. The higher lifetime loss ratios are due to adverse morbidity and persistency experience.

Please refer to Section 22 for a description of the information contained in each Appendix.

**Actuarial Memorandum Supporting Rate Revisions for
The Prudential Insurance Company of American
Individual Long-Term Care Insurance Product
January 6, 2015**

2. Description of Benefits

The policies issued on this form are referred as the “ILTC3” product series. This product was individually underwritten and provides comprehensive long-term care coverage for care received in a nursing home, assisted living facility, or hospice in addition to home and community-based care. This product is intended to be Tax Qualified Long Term Care Insurance Contracts as defined by the internal revenue code section 7702B(b).

This product reimburses covered long-term care expenses subject to the amount of coverage purchased. A waiting period, institutional daily benefit amount, home and community care percentage, maximum lifetime benefit amount and inflation protection option are selected at issue. The available choices can be found in the attached premium rate tables.

The benefit eligibility criteria is based on the insured’s loss of the ability to perform two of the six activities of daily living (ADLs) or having a severe cognitive impairment. Activities of Daily Living are bathing, continence, dressing, eating, toileting, and transferring. Premiums will be waived beginning the first day of the next month following when LTC benefits are payable.

The removal of Cash Alternative Benefit Rider allows for policyholders that do not have a Cash Benefit Rider or a Flex Cash Benefit Rider the option to delete their 40% cash alternative benefit in exchange for a lower premium.

3. Renewability Clause

This product is a Guaranteed Renewable, Individual Long Term Care policy.

4. Marketing Method

This plan was marketed to individuals by licensed agents.

5. Applicability

The revised rates contained in this memorandum will be applicable to in-force policies, as these policy forms are no longer sold in the market, and all future periodic inflation protection offers. The revised premium rate schedules can be found in Appendix F.

6. Actuarial Assumptions

**Actuarial Memorandum Supporting Rate Revisions for
The Prudential Insurance Company of American
Individual Long-Term Care Insurance Product
January 6, 2015**

The actuarial assumptions used to project the future premiums and claims are described in this section. Appendix C provides further details of the experience studies conducted that were used to develop the actuarial assumptions. These current assumptions, developed in 2015, are Prudential's best estimate expectations of future experience and do not include any provisions for adverse experience. These assumptions are the basis for the assumptions being used in the company's internal cash flow testing.

Morbidity

The best estimate morbidity assumptions were developed based on a combination of the Prudential's historical claim experience, the Milliman 2011 *Long Term Care Guidelines (Guidelines)* and judgment. The *Guidelines* reflect over 15.3 million life years of exposure and \$10.5 billion of incurred claims and the experience and judgment of Milliman actuaries. The policy design and coverages, the underwriting applied at the time, and the claim adjudication process were all considered when setting the claim cost assumptions. The claim cost assumptions reflect Prudential's current best estimate of future morbidity, including morbidity improvement of 1% per year through 2035. The assumptions do not include any adverse selection from the rate increase or loads for moderately adverse experience.

Mortality

The mortality assumptions were developed from a mortality study conducted on the Prudential's experience and judgment. The best estimate mortality assumption is the Annuity 2000 Basic Table on a sex distinct basis with mortality selection factors, mortality attained age factors and mortality improvement. The mortality selection factors vary by issue age and duration and start at 0.25 in duration 1 and grade up to an ultimate factor by duration 30. The ultimate factor varies by issue age and ranges from 0.90 at the younger ages to 1.05 at the older ages. A set of mortality attained age factors is also applied that lowers the mortality by 10% for attained ages 60 and under and grades to an increase of 10% in mortality by age 100. Mortality improvement of 0.6% per year through 2035 is assumed. The assumptions do not include any loads for moderately adverse experience.

Lapses

The voluntary lapse assumptions were developed from a policy persistency study conducted on the Company's experience and judgment. Lapse rates are combined with mortality rates to derive the total termination rate. In addition, the projections also terminate a policy if the

**Actuarial Memorandum Supporting Rate Revisions for
The Prudential Insurance Company of American
Individual Long-Term Care Insurance Product
January 6, 2015**

insured exhausts their benefits. We assumed all remaining policies would terminate at attained age 120. The lapse assumptions represent the best estimate expectations of future experience and do not include any provisions for adverse experience. Lastly, the projections include an annual shock lapse rate of 1.3% assumed over the first two years of implementation. Voluntary lapse rates are shown below and vary by policy duration.

Voluntary Lapse Rates - Lifetime Pay				
Duration	Single - No Inflation	Single - Inflation	Married - No Inflation	Married - Inflation
1	9.50%	8.00%	6.00%	4.00%
2	6.50%	6.00%	4.00%	3.00%
3	5.50%	4.50%	3.50%	3.00%
4	5.00%	3.50%	3.00%	2.50%
5	4.50%	3.00%	2.50%	1.80%
6	3.50%	3.00%	2.00%	1.50%
7	3.00%	3.00%	1.75%	1.50%
8	2.75%	2.00%	1.75%	1.30%
9	2.75%	1.75%	1.75%	1.00%
10-20	2.75%	1.75%	1.75%	0.75%
21+	2.50%	1.50%	1.50%	0.50%

NOTE: No inflation includes plans without inflation and GPO.

Voluntary Lapse Rates - Limited Pay			
Duration	10 Pay	Premium Reduction at Age 65	Paid Up at Age 65
1	3.50%	4.50%	5.00%
2	2.50%	3.50%	4.50%
3	1.50%	3.00%	3.50%
4	1.00%	2.50%	2.50%
5	0.50%	2.00%	2.00%
6	0.50%	2.00%	2.00%
7	0.50%	1.50%	1.50%
8	0.50%	1.50%	1.50%
9	0.00%	1.50%	1.50%
10-20	0.00%	1.50%	1.25%
21+	0.00%	1.25%*	1.00%**

*Starting at age 55, grade into 1.0% ultimate lapse rate by attained age 65.

**Actuarial Memorandum Supporting Rate Revisions for
The Prudential Insurance Company of American
Individual Long-Term Care Insurance Product
January 6, 2015**

** Starting at age 55, grade into 0.0% ultimate lapse rate by attained age 65.

Appendix D contains a comparison of the actual total termination rates to both the original pricing assumptions and current assumptions.

Interest Rate

An annual interest rate of 4.0% was used to calculate the lifetime loss ratio in the supporting appendices. This was determined based on the predominant number of certificates issued in years that the maximum statutory valuation rate was 4.0%.

Expenses

The need for a rate increase is based on the lifetime loss ratio being in excess of the minimum loss ratio. Expenses do not directly impact the lifetime loss ratio and therefore are not used as justification for the rate increase. As such, expenses are not being projected and are not included in this filing.

7. Premium Classes

The Company used several premium classes based on the underwriting assessment of the potential policyholder at time of issue. These premium classes are shown in the premium rate schedules included in Appendix F.

8. Issue Age Range

This product was available for issue ages up to 79. Premiums are based on issue age.

9. Area Factors

The Company did not use area factors within the state in the premium scale for this product.

10. Average Annual Premium

The average annual premium for this product for both prior to the impact of the requested

**Actuarial Memorandum Supporting Rate Revisions for
The Prudential Insurance Company of American
Individual Long-Term Care Insurance Product
January 6, 2015**

rate increase, and after, is indicated in Appendix A to this memorandum.

11. Modal Premium Factors

Modal loads are required because of the varied expenses incurred by the Company and the effect of interest and persistency. The modal premium factors will remain unchanged from the current factors.

12. Claim Liability and Reserve

Claim reserves were calculated using appropriate actuarial methods for IBNR and for open claims on a disabled life basis. The claim reserves were discounted to the date of incurral for each claim and have been included in the historical incurred claims. An annual interest rate of 4.0% was used to calculate the present value of future claims in the supporting exhibits.

13. Active Life Reserves

We have provided supporting evidence for the justification of the proposed increase based on the relationship of incurred claims divided by earned premium compared to the minimum required loss ratios. Incurred claims exclude any change in active life reserves.

14. Trend Assumption

Benefits payable are equal to or less than the daily or monthly benefit limit. We have not included any medical trend in the projections.

15. Requested Rate Increase and Demonstration of Satisfaction of Loss Ratio Requirements

Prudential is requesting an average premium increase of 17.8%. These rate increases vary depending on whether the policyholder has automatic inflation or not.

Policy Type	ILTC3
Automatic Inflation	20.8%
No Inflation	0.0%
Average (using nationwide distribution mix)	17.8%

**Actuarial Memorandum Supporting Rate Revisions for
The Prudential Insurance Company of American
Individual Long-Term Care Insurance Product
January 6, 2015**

Satisfaction of the loss ratio requirement is demonstrated in Appendix A. The demonstration is based on a 58% loss ratio on the initial premium and an 85% loss ratio on the increased premium. This approach requires that the sum of the historical and projected future incurred claims must exceed the sum of 58% of the initial premium and 85% of the increased premium.

16. Distribution of Business

The historical experience reflects the actual distribution of policies during the experience period. We used the current distribution of business as of June 30, 2015 to project future experience. Appendix E contains the distribution of the inforce policies by key demographic and benefit characteristics.

17. Experience - Past and Future

The historical and projected nationwide and state-specific experience, both with and without the rate increase, is contained in Appendix B.

Historical experience is shown by claim incurral year.

18. Lifetime Loss Ratio

The anticipated nationwide lifetime loss ratios, both without a rate increase and with the requested rate increase, are shown in Appendix A. The development of these nationwide lifetime loss ratios, are shown in Appendix B and Appendix G.

The rate increase is assumed effective April 1, 2016 in our projections.

19. History of Rate Adjustments

See Appendix A for a history of rate increases on inforce policyholders with this policy form in this state.

20. Number of Policyholders

The current number of policyholders as of June 30, 2015 can be found in Appendix A.

**Actuarial Memorandum Supporting Rate Revisions for
The Prudential Insurance Company of American
Individual Long-Term Care Insurance Product
January 6, 2015**

21. Proposed Effective Date

This rate revision will be implemented following state approval and a minimum of a 60 day notification to the certificate holder. Implementation will be no earlier than April 1, 2016.

22. Summary of Appendices

Appendix A contains information that is specific to the state in which this filing is made. Examples of some items include are the requested rate increase, the average annual premium, demonstration of meeting required minimum loss ratio standards, the number of policyholders inforce, etc.

Appendix B contains historical and projected nationwide experience for all policies issued under this form. The appendix also includes the projected lifetime loss ratios both without and with the proposed increase.

Appendix C contains three exhibits that show our actual to expected lapse, mortality and morbidity experience.

Appendix D contains a breakdown of our current persistency assumptions.

Appendix E contains the distribution of the inforce policies by key demographic and benefit characteristics.

Appendix F contains the premium rate pages associated with this filing.

Appendix G contains the same information as Appendix B except it contains only state specific experience and projections.

23. Relationship of Renewal Premium to New Business Premium.

Prudential is no longer selling any new Long-Term Care business. Therefore, the comparison of renewal premium rates after the rate increase to the Company's current new business premium rate schedule is not applicable.

24. Actuarial Certification

**Actuarial Memorandum Supporting Rate Revisions for
The Prudential Insurance Company of American
Individual Long-Term Care Insurance Product
January 6, 2015**

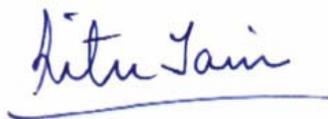
I am a member of the American Academy of Actuaries. I meet the Academy's qualification standards for rendering this opinion and am familiar with the requirements for filing rate increases for long term care insurance premiums.

To the best of my knowledge and judgment this rate filing is in compliance with the applicable laws and regulations of this State as they relate to premium rate developments and revisions, with the exception that Prudential is not currently providing a certification that no future increases are anticipated under moderately adverse experience.

The policy design and coverages, the underwriting used at the time of issue, and the claim adjudication process were all considered when setting the actuarial assumptions.

In forming my opinion, I have used actuarial assumptions and actuarial methods as I considered necessary. I have relied on projection information provided by Dan Nitz, FSA, MAAA. He is an Actuary at Milliman who used data and assumptions that were developed and supplied by Prudential in developing these projections. The pricing assumptions are consistent with Prudential's best estimates at the time of this filing and do not include a margin for adverse experience.

The premium rates are not excessive or unfairly discriminatory. Prudential may need to file for additional in-force premium increases on these forms in the future.



Ritu Jain, ASA, MAAA
Associate Actuary
Prudential Long Term Care
January 5, 2016

Appendix A
The Prudential Insurance Company of America
ILTC3

Pennsylvania

Requested Rate Increase for No Inflation Policies = 0%
Requested Rate Increase for Auto Inflation Policies = 20.8%

10 Average Annual Premium

	Pennsylvania	Nationwide
Without Increase	\$2,370	\$2,670
With Increase	\$2,755	\$3,144

15 Satisfaction of Loss Ratio Requirements

Rate Stability Requirement

1) Total Incurred Claims		2,072,463,064
58% of initial premium	1,084,796,356	
85% of increased premium	364,442,932	
2) Sum of 58%/85% Premium		1,449,239,288
Is 1 greater than 2?		Yes

18 Lifetime Loss Ratio

Policy type	Without Increase	With Increase
All	101%	90%
No Inflation	71%	71%
Auto Inflation	105%	93%

19 History of Rate Adjustments

No Inflation Policies:

10% Implemented on 2/1/2014

Auto Inflation Policies:

20% Implemented on 2/1/2014

20 Number of Policyholders and Annualized Premium as of June 30, 2015

Policy Type	Pennsylvania	Nationwide
All	1,530	39,867
No Inflation	376	7,006
Auto Inflation	1,154	32,861

Policy Type	Pennsylvania	Nationwide
All	\$3,625,732	\$106,435,993
No Inflation	\$789,856	\$15,464,580
Auto Inflation	\$2,835,876	\$90,971,413

Appendix B
The Prudential Insurance Company of America
Historical and Projected Experience
Nationwide Experience
Pennsylvania Rate Basis
ILTC3

Historical

Calendar Year	Earned Premium	Paid Claims	Claim Reserve	Incurred Claims	Incurred Ratio
2005	640,606	0	0	0	0%
2006	6,903,546	7,702	0	7,702	0%
2007	16,549,185	494,504	111,222	605,726	4%
2008	31,209,263	1,322,684	249,422	1,572,107	5%
2009	46,029,828	3,218,833	540,867	3,759,700	8%
2010	62,050,973	2,624,781	846,590	3,471,370	6%
2011	88,430,437	2,287,979	1,058,025	3,346,004	4%
2012	107,311,165	3,732,061	3,859,048	7,591,109	7%
2013	105,881,731	2,826,428	4,079,411	6,905,840	7%
2014	113,893,416	1,504,489	7,571,211	9,075,700	8%
2015*	57,561,289	7,408	6,486,267	6,493,675	11%
Active Life Reserve Balance as of 06/30/2015:			472,242,560		

Projections without Requested Rate Increase

Calendar Year	Earned Premium	Incurred Claims	Incurred Ratio
2015**	57,577,852	6,988,597	12%
2016	112,815,178	15,818,140	14%
2017	109,764,170	18,890,645	17%
2018	106,300,480	22,309,989	21%
2019	102,883,789	26,046,301	25%
2020	99,317,910	30,122,523	30%
2021	94,564,408	34,513,387	36%
2022	90,090,747	39,322,141	44%
2023	87,292,707	44,688,911	51%
2024	84,550,611	50,629,401	60%
2025	81,742,323	57,134,096	70%
2026	78,866,830	64,193,239	81%
2027	75,928,008	71,822,694	95%
2028	72,937,851	80,037,368	110%
2029	69,901,627	88,821,893	127%
2030	66,847,973	98,083,491	147%
2031	63,770,635	107,725,829	169%
2032	60,704,261	117,682,710	194%
2033	57,632,151	127,872,203	222%
2034	54,530,493	138,116,474	253%
2035	51,424,429	148,045,304	288%
2036	48,308,113	158,099,984	327%
2037	45,197,059	168,131,383	372%
2038	42,124,805	177,277,459	421%
2039	39,091,015	185,336,382	474%
2040	36,107,163	192,024,673	532%
2041	33,198,107	197,065,667	594%
2042	30,374,411	200,472,229	660%
2043	27,652,850	202,256,822	731%
2044	25,045,512	202,439,840	808%
2045	22,566,770	200,895,713	890%
2046	20,227,201	197,526,710	977%
2047	18,033,382	192,467,852	1067%
2048	15,990,065	185,991,580	1163%
2049	14,100,894	178,319,874	1265%
2050	12,366,767	169,543,621	1371%
2051	10,786,125	159,776,288	1481%
2052	9,355,310	149,229,195	1595%
2053	8,069,140	138,207,267	1713%
2054 and later	42,727,862	1,178,792,793	2759%

Projections with Requested Rate Increase

Calendar Year	Earned Premium	Incurred Claims	Incurred Ratio
2015**	57,577,852	6,988,597	12%
2016	122,108,871	15,727,002	13%
2017	125,626,050	18,676,228	15%
2018	121,802,706	22,035,418	18%
2019	117,908,697	25,704,818	22%
2020	113,838,334	29,703,997	26%
2021	108,387,595	34,004,799	31%
2022	103,268,432	38,709,838	37%
2023	100,102,112	43,959,697	44%
2024	96,999,815	49,766,781	51%
2025	93,820,244	56,120,566	60%
2026	90,561,544	63,010,605	70%
2027	87,226,908	70,451,468	81%
2028	83,830,321	78,456,675	94%
2029	80,377,599	87,010,592	108%
2030	76,901,714	96,021,902	125%
2031	73,394,577	105,395,992	144%
2032	69,896,545	115,066,050	165%
2033	66,388,404	124,956,785	188%
2034	62,842,454	134,895,195	215%
2035	59,287,651	144,518,805	244%
2036	55,717,344	154,259,900	277%
2037	52,149,659	163,968,237	314%
2038	48,623,414	172,807,573	355%
2039	45,138,271	180,582,769	400%
2040	41,707,737	187,022,742	448%
2041	38,360,513	191,857,510	500%
2042	35,109,132	195,097,018	556%
2043	31,973,250	196,761,148	615%
2044	28,967,069	196,872,546	680%
2045	26,107,504	195,308,293	748%
2046	23,407,048	191,975,619	820%
2047	20,873,554	187,008,954	896%
2048	18,512,761	180,669,232	976%
2049	16,329,121	173,177,826	1061%
2050	14,323,892	164,617,238	1149%
2051	12,495,461	155,100,452	1241%
2052	10,839,766	144,835,688	1336%
2053	9,350,976	134,114,533	1434%
2054 and later	49,533,014	1,142,955,369	2307%

* Historical 2015 Experience - 1/1/2015 through 6/30/2015
** Projected 2015 Experience - 7/1/2015 through 12/31/2015

Loss Ratio Summaries

Accumulated Value of Historical to 6/30/2015	723,489,895	47,808,459	7%	723,489,895	47,808,459	7%
Present Value of Future to 6/30/2015	1,385,300,206	2,074,896,017	150%	1,575,605,040	2,024,654,605	129%
Total Values (Discounted at 4%)	2,108,790,101	2,122,704,475	101%	2,299,094,935	2,072,463,064	90%
Projected Loss Ratio without Rate Increase				Projected Loss Ratio with Rate Increase		
Overall		101%	Overall		90%	
No Automatic Inflation		71%	No Automatic Inflation		71%	
Automatic Inflation		105%	Automatic Inflation		93%	
Minimum Lifetime Loss Ratio		60%				

Appendix G
The Prudential Insurance Company of America
Historical and Projected Experience
Pennsylvania Experience
ILTC3

Historical

Calendar Year	Earned Premium	Paid Claims	Claim Reserve	Incurred Claims	Incurred Ratio
2005	12,956	0	0	0	0%
2006	468,713	0	0	0	0%
2007	1,124,764	0	0	0	0%
2008	1,673,501	25,681	0	25,681	2%
2009	2,135,409	0	0	0	0%
2010	2,802,214	220,008	64,959	284,967	10%
2011	3,531,923	70,851	33,172	104,023	3%
2012	3,611,796	187,110	132,091	319,201	9%
2013	3,470,996	34,215	81,137	115,352	3%
2014	3,613,284	47,438	429,301	476,739	13%
2015*	1,802,913	0	455,927	455,927	25%
Active Life Reserve Balance as of 06/30/2015:			16,594,575		

Projections without Requested Rate Increase

Calendar Year	Earned Premium	Incurred Claims	Incurred Ratio
2015**	1,795,162	280,380	16%
2016	3,520,405	626,324	18%
2017	3,431,406	734,098	21%
2018	3,343,449	853,059	26%
2019	3,257,866	982,736	30%
2020	3,171,418	1,122,140	35%
2021	3,082,537	1,273,507	41%
2022	2,988,950	1,441,738	48%
2023	2,890,306	1,628,302	56%
2024	2,790,980	1,831,476	66%
2025	2,689,376	2,050,016	76%
2026	2,584,611	2,283,327	88%
2027	2,479,752	2,530,138	102%
2028	2,373,832	2,792,970	118%
2029	2,267,043	3,071,938	136%
2030	2,159,695	3,359,598	156%
2031	2,052,254	3,653,814	178%
2032	1,944,980	3,950,998	203%
2033	1,837,354	4,247,105	231%
2034	1,729,651	4,527,407	262%
2035	1,622,299	4,780,827	295%
2036	1,515,514	5,035,080	332%
2037	1,409,515	5,272,281	374%
2038	1,304,870	5,461,597	419%
2039	1,202,168	5,595,361	465%
2040	1,101,952	5,669,939	515%
2041	1,004,799	5,691,952	566%
2042	911,266	5,653,294	620%
2043	821,894	5,558,615	676%
2044	737,200	5,419,296	735%
2045	657,531	5,234,075	796%
2046	583,162	5,013,141	860%
2047	514,299	4,762,801	926%
2048	451,080	4,493,984	996%
2049	393,509	4,213,375	1071%
2050	341,455	3,925,570	1150%
2051	294,745	3,637,455	1234%
2052	253,130	3,355,569	1326%
2053	216,342	3,082,559	1425%
2054 and later	1,118,939	27,581,624	2465%

Projections with Requested Rate Increase

Calendar Year	Earned Premium	Incurred Claims	Incurred Ratio
2015**	1,795,162	280,380	16%
2016	3,785,263	622,270	16%
2017	3,885,062	725,048	19%
2018	3,790,713	841,877	22%
2019	3,695,557	969,196	26%
2020	3,599,517	1,105,890	31%
2021	3,500,738	1,254,152	36%
2022	3,396,534	1,418,796	42%
2023	3,286,469	1,601,248	49%
2024	3,175,619	1,799,776	57%
2025	3,062,089	2,013,136	66%
2026	2,944,812	2,240,708	76%
2027	2,827,326	2,481,282	88%
2028	2,708,474	2,737,315	101%
2029	2,588,467	3,008,881	116%
2030	2,467,654	3,288,673	133%
2031	2,346,538	3,574,594	152%
2032	2,225,420	3,863,204	174%
2033	2,103,707	4,150,536	197%
2034	1,981,714	4,422,255	223%
2035	1,859,936	4,667,580	251%
2036	1,738,623	4,913,603	283%
2037	1,618,036	5,142,919	318%
2038	1,498,827	5,325,470	355%
2039	1,381,682	5,453,850	395%
2040	1,267,237	5,524,583	436%
2041	1,156,165	5,544,169	480%
2042	1,049,119	5,504,766	525%
2043	946,732	5,410,911	572%
2044	849,616	5,273,723	621%
2045	758,182	5,092,007	672%
2046	672,761	4,875,716	725%
2047	593,605	4,631,009	780%
2048	520,886	4,368,500	839%
2049	454,617	4,094,677	901%
2050	394,664	3,814,016	966%
2051	340,830	3,533,218	1037%
2052	292,840	3,258,640	1113%
2053	250,391	2,992,830	1195%
2054 and later	1,297,512	26,744,938	2061%

* Historical 2015 Experience - 1/1/2015 through 6/30/2015
** Projected 2015 Experience - 7/1/2015 through 12/31/2015

Loss Ratio Summaries

Accumulated Value of Historical to 6/30/2015	28,066,482	1,942,243	7%	28,066,482	1,942,243	7%
Present Value of Future to 6/30/2015	44,101,562	62,165,473	141%	49,786,797	60,717,468	122%
Total Values (Discounted at 4%)	72,168,044	64,107,716	89%	77,853,280	62,659,712	80%
Projected Loss Ratio without Rate Increase				Projected Loss Ratio with Rate Increase		
Overall		89%		Overall		80%
No Automatic Inflation		63%		No Automatic Inflation		63%
Automatic Inflation		95%		Automatic Inflation		84%

**Appendix C
Exhibit 1
The Prudential Insurance Company of America
Mortality Study
Experience by Policy Duration
ILTC3**

Policy Duration	Total Lives	Total Terminations	Actual Deaths	Expected Deaths	Mortality Rate		A:E
					Actual	Expected	
1 - 3	139,781	6,252	223	264	0.16%	0.19%	85%
4 - 6	71,186	2,253	239	282	0.34%	0.40%	85%
7 - 10	17,138	455	110	112	0.64%	0.65%	98%
10+	2	0	0	0	0.00%	0.46%	0%
Total	228,107	8,960	572	657	0.25%	0.29%	87%

Notes:

- 1) Experience is through June 30, 2015.
- 2) Expected Mortality Rate is based on the current assumption and uses the Annuity 2000 Table, with mortality selection factors, attained age factors, and 0.6% improvement per year from year 2000.
- 3) Total Terminations include Actual Deaths, Actual Lapses, and Actual Benefit Exhausts

Appendix C
Exhibit 1
The Prudential Insurance Company of America
Mortality Study
Experience by Attained Age
ILTC3

Attained Age	Total Lives	Total Terminations	Actual Deaths	Expected Deaths	Mortality Rate		A:E
					Actual	Expected	
<50	25,279	1,996	12	11	0.05%	0.04%	108%
50-54	31,213	1,370	21	30	0.07%	0.10%	70%
55-59	50,404	1,728	70	77	0.14%	0.15%	91%
60-64	60,108	1,847	125	147	0.21%	0.25%	85%
65-69	40,518	1,271	135	179	0.33%	0.44%	75%
70-74	15,594	528	123	127	0.79%	0.82%	97%
75-79	4,183	184	65	62	1.55%	1.48%	105%
80-84	788	34	19	22	2.41%	2.81%	86%
85-89	21	2	2	1	9.52%	5.19%	184%
Total	228,107	8,960	572	657	0.25%	0.29%	87%

Notes:

- 1) Experience is through June 30, 2015.
- 2) Expected Mortality Rate is based on the current assumption and uses the Annuity 2000 Table, with mortality selection factors, attained age factors, and 0.6% improvement per year from year 2000.
- 3) Total Terminations include Actual Deaths, Actual Lapses, and Actual Benefit Exhausts

Appendix C
Exhibit 2
Voluntary Lapse Study
The Prudential Insurance Company of America
Experience by Policy Duration
ILTC3

Policy Duration	Total Lives	Total Terminations		Mortality Rate		Voluntary Lapse Rate		
		Count	Rate	Actual	Expected	Actual	Implied	"Current"
1	47,701	2,691	5.64%	0.12%	0.12%	5.5%	5.5%	5.1%
2	45,008	1,838	4.08%	0.14%	0.19%	3.9%	3.9%	3.7%
3	42,568	1,564	3.67%	0.23%	0.27%	3.4%	3.4%	3.4%
4	31,675	995	3.14%	0.27%	0.34%	2.9%	2.8%	2.8%
5	21,875	694	3.17%	0.34%	0.42%	2.8%	2.8%	2.1%
6	15,683	526	3.35%	0.50%	0.50%	2.9%	2.9%	1.8%
7	9,843	262	2.66%	0.64%	0.60%	2.0%	2.1%	1.8%
8	5,087	131	2.58%	0.69%	0.71%	1.9%	1.9%	1.5%
9	1,786	58	3.25%	0.67%	0.83%	2.6%	2.4%	1.3%
10	2	0	0.00%	0.00%	0.46%	0.0%	-0.5%	0.8%
Total	221,226	8,759	3.96%	0.26%	0.29%			

Notes:

- 1) Experience is through June 30, 2015, and only includes lifetime pay policies (excludes limited pay policies).
- 2) Expected Mortality Rate is based on the current assumption and uses the Annuity 2000 Table, with mortality selection factors, attained age factors, and 0.6% improvement per year from year 2000.
- 3) Actual Voluntary Lapse Rate is the Total Termination Rate minus the Actual Mortality Rate minus the Actual Benefit Exhaust Rate.
Benefit Exhausts are included in the Total Terminations listed above but excluded from the Actual Voluntary Lapse Rates.
- 4) Implied Voluntary Lapse Rate is the Total Termination Rate minus the Expected Mortality Rate minus the Actual Benefit Exhaust Rate.
- 5) Current Voluntary Lapse Rate is the current projection assumption.
The ultimate lapse rates vary between 0.5% to 2.5% depending on inflation and marital status.
The current lapse rates do not include shock lapse assumptions.

Appendix C
Exhibit 3
The Prudential Insurance Company of America
Claim Study
Experience by Calendar Year
ILTC3

Calendar Year	Total Lives	Actual Claims					Expected Claims			Actual to Expected		
		Count	Paid	Reserve	Severity	Incurred	Count	Severity	Incurred	Incidence	Severity	Incurred
2005	308	0	-	-	-	-	0	88,088	12,777	0%	0%	0%
2006	3,168	1	4,439	-	4,439	4,439	2	91,817	149,044	62%	5%	3%
2007	7,490	3	470,945	105,923	192,289	576,868	5	98,050	473,707	62%	196%	122%
2008	13,366	13	1,259,671	237,540	115,170	1,497,210	10	104,656	1,033,899	132%	110%	145%
2009	19,418	36	3,065,485	515,100	99,461	3,580,585	16	110,374	1,794,653	221%	90%	200%
2010	25,753	26	2,486,363	806,257	126,639	3,292,620	25	114,787	2,833,274	105%	110%	116%
2011	36,098	46	2,178,978	1,007,620	69,274	3,186,598	37	118,563	4,358,044	125%	58%	73%
2012	43,092	69	3,554,262	3,675,200	104,775	7,229,462	48	122,305	5,921,143	143%	86%	122%
2013	42,420	73	2,616,397	3,885,065	89,061	6,501,462	61	126,510	7,771,454	119%	70%	84%
2014	40,863	90	1,432,814	7,210,512	96,037	8,643,326	74	132,043	9,774,609	122%	73%	88%
2015	19,640	58	7,055	6,177,256	106,626	6,184,311	42	132,444	5,527,567	139%	81%	112%
Total	251,618	415	17,076,408	23,620,473	98,065	40,696,881	320	123,991	39,650,171	130%	79%	103%

Notes:

- 1) Experience is through June 30, 2015.
- 2) Paid claims represent the present value of paid claims discounted to the claim incurred date.
- 3) Reserve amounts represent the present value of the remaining claim reserve (including IBNR) discounted to the claim incurred date.
- 4) Severity is defined as incurred claims divided by the count of claims.
- 5) Expected Claims are the current best estimate assumptions used in the projections and are based on the Milliman 2011 Long-Term Care Guidelines including fitting factors.
- 6) Claim dollar amounts are discounted using a 4.5% interest rate (both actual and expected).
- 7) This exhibit excludes waiver of premium and return of premium benefits in both actual and expected results.

Appendix C
Exhibit 3
The Prudential Insurance Company of America
Claim Study
Experience by Policy Duration
ILTC3

Policy Duration	Total Lives	Actual Claims					Expected Claims			Actual to Expected		
		Count	Paid	Reserve	Severity	Incurred	Count	Severity	Incurred	Incidence	Severity	Incurred
1 - 3	138,169	136	9,138,170	4,508,999	100,347	13,647,169	98	115,407	11,265,273	139%	87%	121%
4 - 6	86,787	152	6,235,528	9,166,508	101,329	15,402,037	138	126,855	17,478,174	110%	80%	88%
7 - 9	25,653	118	1,672,310	9,090,883	91,213	10,763,193	79	129,624	10,291,396	149%	70%	105%
10 - 11	1,008	9	30,400	854,083	98,276	884,484	5	123,209	615,327	180%	80%	144%
Total	251,618	415	17,076,408	23,620,473	98,065	40,696,881	320	123,991	39,650,171	130%	79%	103%

Notes:

- 1) Experience is through June 30, 2015.
- 2) Paid claims represent the present value of paid claims discounted to the claim incurred date.
- 3) Reserve amounts represent the present value of the remaining claim reserve (including IBNR) discounted to the claim incurred date.
- 4) Severity is defined as incurred claims divided by the count of claims.
- 5) Expected Claims are the current best estimate assumptions used in the projections and are based on the Milliman 2011 Long-Term Care Guidelines including fitting factors.
- 6) Claim dollar amounts are discounted using a 4.5% interest rate (both actual and expected).
- 7) This exhibit excludes waiver of premium and return of premium benefits in both actual and expected results.

Appendix C
Exhibit 3
The Prudential Insurance Company of America
Claim Study
Experience by Attained Age
ILTC3

Attained Age	Total Lives	Count	Actual Claims			Expected Claims			Actual to Expected			
			Paid	Reserve	Severity	Incurred	Count	Severity	Incurred	Incidence	Severity	Incurred
<=59	113,940	66	3,283,006	4,537,565	118,493	7,820,571	32	164,384	5,235,329	207%	72%	149%
60-64	66,425	81	4,507,515	4,863,052	115,686	9,370,567	49	138,153	6,828,534	164%	84%	137%
65-69	46,662	80	2,850,474	3,919,393	84,623	6,769,866	79	124,784	9,848,516	101%	68%	69%
70-74	18,619	85	3,697,012	4,058,990	91,247	7,756,002	77	118,348	9,159,335	110%	77%	85%
75-79	4,984	65	2,098,616	3,967,251	93,321	6,065,867	55	107,159	5,934,144	117%	87%	102%
80-84	950	34	557,068	1,946,386	73,631	2,503,453	25	100,704	2,499,557	137%	73%	100%
85-89	37	4	82,719	327,836	102,639	410,555	2	72,716	144,755	201%	141%	284%
Total	251,618	415	17,076,408	23,620,473	98,065	40,696,881	320	123,991	39,650,171	130%	79%	103%

Notes:

- 1) Experience is through June 30, 2015.
- 2) Paid claims represent the present value of paid claims discounted to the claim incurred date.
- 3) Reserve amounts represent the present value of the remaining claim reserve (including IBNR) discounted to the claim incurred date.
- 4) Severity is defined as incurred claims divided by the count of claims.
- 5) Expected Claims are the current best estimate assumptions used in the projections and are based on the Milliman 2011 Long-Term Care Guidelines including fitting factors.
- 6) Claim dollar amounts are discounted using a 4.5% interest rate (both actual and expected).
- 7) This exhibit excludes waiver of premium and return of premium benefits in both actual and expected results.

Appendix C
The Prudential Insurance Company of America
Description of Experience Analysis and Assumption Setting

Mortality Study

A mortality study was conducted on the Company's actual experience on its entire block of long term care business. In general, the best estimate mortality assumptions are based on a steepened version of the Annuity 2000 Basic table with mortality selection factors and mortality improvement. Actual deaths were determined by comparing insureds against the Social Security Administration's Death Master File (DMF). A terminated policy is considered a death if it matched the DMF or was coded as "Death" in the administrative system. Otherwise, the terminated policy is considered a voluntary lapse (if it did not exhaust benefits).

The future expected mortality assumptions were developed based on the historical actual experience and judgment. Based on our analysis, the Annuity 2000 table matched actual experience the closest, with some adjustments. First, a steepened mortality table matches the experience better. The mortality was lowered by 10% for ages less than 60 and raised the mortality 10% for ages above 100 (grading from 90% to 100% from age 60 to age 70 and then from 100% to 110% from age 90 to age 100). Second, mortality selection factors were developed by issue age and duration. Lastly, mortality improvement of 0.6% per year from 2000 through 2035 was assumed.

Exhibit 1 contains the comparison of actual experience through June 30, 2015 to the current mortality assumptions. The Exhibit shows total lives, total terminations (both voluntary lapse and actual deaths), actual deaths, expected deaths and the resulting mortality rates. Experience is shown by policy duration and attained age. Since the current mortality assumptions reasonably match the historical actual experience, the assumptions are reasonable to use to project the inforce into the future.

Voluntary Lapse Study

A voluntary lapse study was also conducted on the Company's actual experience. Voluntary lapse rates were calculated based on two approaches. First, "actual lapses" were determined by subtracting actual deaths and actual benefit exhausts from total terminations. Second, "implied lapses" were determined by subtracting expected deaths, using the mortality assumptions discussed above, and actual exhausts from total terminations. To the extent that the actual deaths are understated (due to underreporting of deaths or incorrect coding of social security numbers), actual mortality will increase while actual lapses will decrease. The total termination rates will not change.

The future expected voluntary lapse assumptions were developed based on the historical actual

experience and judgment. The expected lapse rates vary by policy duration and select business segments.

Exhibit 2 contains the comparison of actual lapse experience through June 30, 2015 to the current assumptions. The Exhibit shows total lives, total terminations (both voluntary lapse and actual deaths) and actual mortality rate. The voluntary lapse rates are shown as described above, as either “actual lapses” or “implied lapses.” Since the current voluntary lapse assumptions reasonably match the historical actual experience, the assumptions are reasonable to use to project the inforce into the future.

Appendix D contains a comparison of the actual total termination rates to both the original pricing assumptions and current assumptions.

Morbidity Study

A morbidity study was also conducted on the Company’s nationwide actual experience. The approach used to develop best estimate morbidity assumptions was to start with a set of baseline expected claims and review the experience along several key demographic and benefit characteristics. The primary focus of developing the fitting factors was to match historical incurred claims to expected incurred claims.

A claim is defined as an episode of care that is not separated by more than 180 calendar days. Actual claim incidence was determined by counting each claim. Actual incurred claims are based on paid claims and remaining claim reserves discounted (using an interest rate of 4.0% for this experience study) back to the claim incurred date. The claim reserves were discounted from valuation date to the claim incurred date using a 4.0% discount rate and excludes any waiver of premium load, LAE load and explicit margin. The IBNR was allocated across the most recent incurred year of expected claims. Actual incurred claims are calculated by adding together the present value of paid claims and claim reserves. Actual average claim severity was calculated by dividing actual incurred claims by the count of claims. In the morbidity study, waiver of premium was excluded from both the actual claims and expected claims.

The baseline expected incurred claims were developed from Milliman’s 2011 LTC Guidelines (*Guidelines*). Given the large size of the data supporting the *Guidelines*, it was viewed as a credible starting point for the analysis. Included in the baseline, was a 1% per year morbidity improvement in the historical expected claims, with 2011 as the assumed base year. This morbidity improvement is assumed to continue until 2035. Also, a composite factor was developed for the business based on the distribution by state and the area adjustment factors from the *Guidelines*.

The process of developing fitting factors, starting with the baseline expected, generally followed the following steps:

- Review experience by issue year and product to determine if the baseline selection factors used are appropriate
- Review experience by issue age, gender, marital status and / or underwriting type
- Review experience by key benefit and demographic characteristics

It should be noted that many of the factors are related to each other. So, some fitting did involve cycling back to prior steps. Also, the credibility of each specific segment was considered, along with judgment in setting the specific fitting factors.

Exhibit 3 contains the comparison of actual claim experience through June 30, 2015 to the current assumptions by calendar year, policy duration and attained age.

Appendix D
The Prudential Insurance Company of America
Policy Persistency Comparison
Nationwide Experience
ILTC3

Policy Duration	Total Lives	Actual Results			Original Pricing Assumptions			Current Assumptions		
		Total Terminations			Lapse	Mortality	Total Terminations	Lapse	Mortality	Total Terminations
1	47,701	5.6%			6.3%	0.6%	6.9%	5.1%	0.1%	5.2%
2	45,008	4.1%			4.7%	0.7%	5.4%	3.7%	0.2%	3.9%
3	42,568	3.7%			3.7%	0.8%	4.4%	3.4%	0.3%	3.6%
4	31,675	3.1%			2.7%	0.9%	3.6%	2.8%	0.3%	3.1%
5	21,875	3.2%			2.2%	1.0%	3.2%	2.1%	0.4%	2.6%
6	15,683	3.4%			2.0%	1.1%	3.1%	1.8%	0.5%	2.3%
7	9,843	2.7%			2.0%	1.3%	3.2%	1.8%	0.6%	2.4%
8	5,087	2.6%			2.0%	1.4%	3.4%	1.5%	0.7%	2.2%
9	1,786	3.2%			2.0%	1.6%	3.6%	1.3%	0.8%	2.1%
10	2	0.0%			2.0%	0.9%	2.9%	0.8%	0.5%	1.2%

Notes:

- 1) The "Actual Results" are the historical total policy termination rates observed by the Company.
- 2) The "Original Pricing Assumptions" are those assumptions originally used to price the product.
The mortality assumptions are based on the 1994 GAM Table.
The lapse assumptions vary by issue age. The original ultimate lapse rate starting in duration 8 ranged from 1.5% to 2.0% (for lifetime pay).
- 3) The "Current Assumptions" are those used in the projection for the current rate filing.
The mortality assumptions are based on the Annuity 2000 table, with selection factors, mortality attained age factors, and 0.6% mortality improvement per year (from year 2000)
The lapse assumptions vary by premium payment option, inflation and marital status. The current ultimate lapse rate starting in duration 21 ranges from 0.5% to 2.5%.
- 4) Experience is through June 30, 2015 and only includes lifetime pay policies (excludes limited pay policies).

Appendix E
The Prudential Insurance Company of America
Distribution of Inforce Business as of June 30, 2015
ILTC3

	Count	% of Count	Premium	% of Premium
Issue Year				
2005	913	2.3%	2,042,487	1.9%
2006	2,995	7.5%	7,030,329	6.6%
2007	3,873	9.7%	10,003,605	9.4%
2008	5,505	13.8%	14,881,108	14.0%
2009	5,322	13.3%	14,534,812	13.7%
2010	7,511	18.8%	20,484,299	19.2%
2011	10,920	27.4%	30,134,956	28.3%
2012	2,828	7.1%	7,324,396	6.9%
Total	39,867	100.0%	106,435,993	100.0%

	Count	% of Count	Premium	% of Premium
Issue Age				
<30	219	0.5%	224,125	0.2%
30-34	276	0.7%	341,025	0.3%
35-39	605	1.5%	873,714	0.8%
40-44	1,250	3.1%	2,593,449	2.4%
45-49	3,388	8.5%	7,399,049	7.0%
50-54	7,171	18.0%	16,556,162	15.6%
55-59	10,665	26.8%	26,543,950	24.9%
60-64	10,054	25.2%	28,409,619	26.7%
65-69	4,793	12.0%	16,616,995	15.6%
70-74	1,182	3.0%	5,321,798	5.0%
75-79	264	0.7%	1,556,107	1.5%
80+	-	0.0%	0	0.0%
Total	39,867	100.0%	106,435,993	100.0%

Average Issue Age 57.2

	Count	% of Count	Premium	% of Premium
Attained Age				
<30	71	0.2%	59,582	0.1%
30-34	133	0.3%	141,845	0.1%
35-39	272	0.7%	323,098	0.3%
40-44	587	1.5%	862,958	0.8%
45-49	1,181	3.0%	2,366,010	2.2%
50-54	3,079	7.7%	6,840,903	6.4%
55-59	6,580	16.5%	15,466,135	14.5%
60-64	9,896	24.8%	24,580,441	23.1%
65-69	10,378	26.0%	28,666,611	26.9%
70-74	5,522	13.9%	18,042,069	17.0%
75-79	1,706	4.3%	6,741,098	6.3%
80+	462	1.2%	2,345,243	2.2%
Total	39,867	100.0%	106,435,993	100.0%

Average Attained Age 62.9

	Count	% of Count	Premium	% of Premium
Gender				
Male	16,979	42.6%	46,454,774	43.6%
Female	22,888	57.4%	59,981,219	56.4%
Total	39,867	100.0%	106,435,993	100.0%

Appendix E
The Prudential Insurance Company of America
Distribution of Inforce Business as of June 30, 2015
ILTC3

Count % of Count Premium % of Premium

Inflation Option

None	2,899	7.3%	5,956,295	5.6%
GPO	4,107	10.3%	9,508,285	8.9%
5% Simple Lifetime	9,064	22.7%	23,407,241	22.0%
3% Compound Lifetime	4,693	11.8%	10,875,065	10.2%
5% Compound - Double (14 years)	1,913	4.8%	4,732,348	4.4%
5% Compound Lifetime	17,191	43.1%	51,956,759	48.8%
Total	39,867	100.0%	106,435,993	100.0%

Elimination Period

30-Day	1,552	3.9%	4,869,497	4.8%
60-Day	3,948	9.9%	10,466,140	10.4%
90-Day	32,130	80.6%	85,292,838	84.8%
120-Day	675	1.7%	1,613,359	1.6%
180-Day	1,157	2.9%	3,308,695	3.3%
365-Day	405	1.0%	885,463	0.9%
Total	39,867	94.4%	100,628,476	100.0%

Benefit Period*

1 Year	2	0.0%	5,762	0.0%
2 Years	2,092	5.2%	3,329,226	3.1%
3 Years	8,716	21.9%	19,254,241	18.1%
5 Years	24,345	61.1%	66,593,479	62.6%
10 Years	1,309	3.3%	5,059,086	4.8%
Lifetime	3,403	8.5%	12,194,199	11.5%
Total	39,867	100.0%	106,435,993	100.0%

*Benefit Period grouped to nearest primary election

Premium Period

Lifetime	38,513	96.6%	97,452,348	91.6%
Premium Paid-Up at Age 65	172	0.4%	907,001	0.9%
Premium Reduction at Age 65	96	0.2%	286,997	0.3%
10-Pay	1,086	2.7%	7,789,647	7.3%
Total	39,867	100.0%	106,435,993	100.0%

Home Health Reimbursement Level

50%	560	1.4%	1,133,207	1.1%
75%	419	1.1%	973,651	0.9%
100%	32,286	81.0%	85,958,595	80.8%
150%	6,602	16.6%	18,370,541	17.3%
Total	39,867	100.0%	106,435,993	100.0%

Spousal Discount Status

Single	6,259	15.7%	20,197,242	19.0%
Married - 1 Buy	8,493	21.3%	24,456,789	23.0%
Married - 2 Buy	25,115	63.0%	61,781,962	58.0%
Total	39,867	100.0%	106,435,993	100.0%

Appendix E
The Prudential Insurance Company of America
Distribution of Inforce Business as of June 30, 2015
ILTC3

Count % of Count Premium % of Premium

Risk Class

Preferred	13,670	34.3%	32,534,496	30.6%
Standard	0	0.0%	0	0.0%
Standard 1	23,921	60.0%	66,581,930	62.6%
Standard 2	2,101	5.3%	6,764,445	6.4%
Standard 3	175	0.4%	555,123	0.5%
Total	39,867	100.0%	106,435,993	100.0%

Cash Benefit Option

Cash	757	1.9%	3,453,469	3.2%
Reimbursement	38,900	97.6%	102,256,193	96.1%
Flex	210	0.5%	726,331	0.7%
Total	39,867	100.0%	106,435,993	100.0%

Benefit Measure

Daily	15,960	40.0%	39,970,741	37.6%
Monthly	23,907	60.0%	66,465,252	62.4%
Total	39,867	100.0%	106,435,993	100.0%

Non-Forfeiture Option

Yes	883	2.2%	3,024,748	2.8%
No	38,984	97.8%	103,411,246	97.2%
Total	39,867	100.0%	106,435,993	100.0%

Shared Care Rider

Yes	11,132	27.9%	26,909,535	25.3%
No	28,735	72.1%	79,526,458	74.7%
Total	39,867	100.0%	106,435,993	100.0%

Survivorship Rider

Yes	544	1.4%	1,526,438	1.4%
No	39,323	98.6%	104,909,555	98.6%
Total	39,867	100.0%	106,435,993	100.0%

Dual Waiver of Premium Rider

Yes	2,229	5.6%	5,519,956	5.2%
No	37,638	94.4%	100,916,038	94.8%
Total	39,867	100.0%	106,435,993	100.0%

Home Health EP Waiver Rider

Yes	2,640	6.6%	8,346,194	7.8%
No	37,227	93.4%	98,089,799	92.2%
Total	39,867	100.0%	106,435,993	100.0%